U.S. Department of Justice

United States Attorney
Eastern District of New York

AAS/SME/LMB/CJN   *271 Cadman Plaza East*
F. #2019R01145   *Brooklyn, New York 11201*

March 3, 2020

By FedEx and ECF

Moe Fodeman, Esq.
Wilson Sonsini Goodrich & Rosati
1301 Avenue of the Americas, 40th Floor
New York, New York 10019

> Re: United States v. Bo Mao
>   Criminal Docket No. 19-392 (PKC)

Dear Mr. Fodeman:

Enclosed please find the government's fifth production of discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This discovery supplements the government's previous productions, dated January 22, 2020; February 3, 2020; February 11, 2020; and February 28, 2020. This discovery is being produced pursuant to the Protective Order entered by the Court on January 10, 2020. See ECF Docket Entry No. 30. Certain identifying terms used herein are defined in the complaint in this matter. See United States v. Bo Mao, 4:19-MJ-647 (N.D.Tex.). The government also requests reciprocal discovery from the defendant.

Description	Category of Discovery Pursuant to Protective Order	Bates Range
Transcripts, exhibits, pleadings, and other materials from the Civil Trial	Attorneys' Eyes Only ("AEO")	DOJ_MAO_A_0003514440 - DOJ_MAO_A_0003715720
	Regular Discovery Material	DOJ_MAO_A_0003715721 - DOJ_MAO_A_0003770486
	AEO	DOJ_MAO_A_0003770487 - DOJ_MAO_A_0003770489

Very truly yours,

RICHARD P. DONOGHUE
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By: /s/ Thea D. R. Kendler
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David Lim
Trial Attorneys

Enclosures

cc: Clerk of the Court (PKC) (by ECF) (without enclosures)